

1 J. GREGORY LOCKWOOD
2 Law Office of J. Gregory Lockwood, P.L.L.C.
3 522 W. Riverside, Ste. 420
Spokane WA 99201
(509) 624-8200

Judge Mary Alice Theiler
Hearing: 10/28/11

4 Attorney for Defendants

5
6
7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9
10 JOSEPH ANDREW HYLKEMA, a
single man,

11 Plaintiff,

12 v.
13 ASSOCIATED CREDIT SERVICE,
INCORPORATED, a Washington
corporation; LINDA DOE and
JOHN DOE, husband and wife and
the marital community thereof,
jointly and severally,

14
15 Defendants.

16 NO. C11-0211

17
18 **DECLARATION OF J. GREGORY
LOCKWOOD**

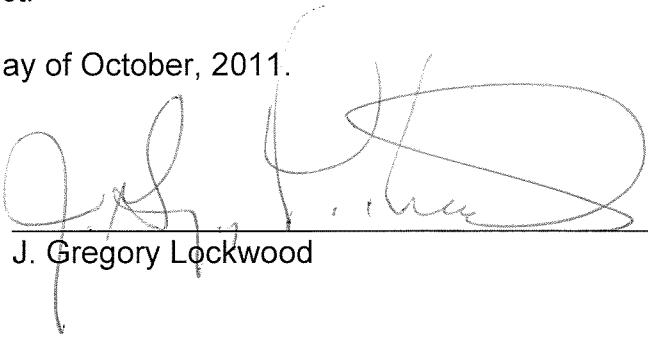
19 I, J. Gregory Lockwood, hereby declare as follows:

20 1. I am over the age of eighteen years, and am competent to testify. I am
21 the attorney for Defendants. I make the following statements based upon my
22 personal knowledge.

23 2. To date Associated Credit Service has incurred \$2,155.58 defending
24 this matter, \$2,008.50 in attorney's fees and \$147.08 in costs. Attached hereto as

1 **Exhibit A** is a true and correct copy of billing statement containing the attorneys fees
2 and costs incurred in this matter to date.
3
4
5

6 I declare under penalty of perjury under the laws of the State of Washington
7 that the foregoing is true and correct.
8

9 Dated at Spokane this 5th day of October, 2011.
10 
11 J. Gregory Lockwood
12
13
14
15
16
17
18
19
20
21
22
23
24
25

CERTIFICATE OF SERVICE

I, J. GREGORY LOCKWOOD, hereby certify that on October 5, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

Joseph Andrew Hylkema

and I hereby certify that I have mailed by United State Postal Service the document to the following non-CM/ECF participants:

none

/s/ J. Gregory Lockwood

J. GREGORY LOCKWOOD

WSBA 20629

Law Office of J. Gregory Lockwood

522 West Riverside, Suite 420

Spokane, WA 99201

Phone: (509) 624-8200

Fax: (509) 623-1491

Email: jgregorylockwood@hotmail.com

Attorney for Defendants

Exhibit A

Law Office of J. Gregory Lockwood, PLLC
 522 W. Riverside Ave., Suite 420
 Spokane, WA 99201

509-624-8200

Statement

Eric Solberg
 Associated Credit Service
 12815 E. Sprague Ave., Ste 200
 Spokane Valley WA 99216

Date
10/31/2011

Date	Services	Quantity	Rate	Amount Due	
				Amount	Balance
05/31/2011	Balance forward				0.00
06/01/2011	Hylkama adv ACS 11-0088- Phone conference with Crystal; prep work on Answer	0.5	195.00	97.50	97.50
06/20/2011	Draft Notice of Appearance and Answer	0.7	195.00	136.50	234.00
06/21/2011	Finalize Answer and file in Federal Court	0.9	195.00	175.50	409.50
06/24/2011	Review motion to strike affirmative defenses	0.3	195.00	58.50	468.00
06/27/2011	Prepare objection to motion to strike affirmative defenses	0.4	195.00	78.00	546.00
06/29/2011	Draft Amended Answer	0.5	195.00	97.50	643.50
06/30/2011	June 2011 copies (142 x .10; 1 x 4.00 color)	1	18.20	18.20	661.70
07/01/2011	Finalize and file objection to motion to dismiss and declaration of Eric Solberg	1.4	195.00	273.00	934.70
07/05/2011	Review Initial Disclosures and prepare disclosures	0.9	195.00	175.50	1,110.20
07/08/2011	Phone conference with Hylkema regarding Joint Status Report	0.3	195.00	58.50	1,168.70
07/18/2011	Postage	1	4.48	4.48	1,173.18
07/31/2011	July 2011 copies (160 x .10; 4 x 1.00 color)	1	20.00	20.00	1,193.18
08/18/2011	Request discovery and summary judgment memo preparation	0.6	195.00	117.00	1,310.18
08/30/2011	Call with David Solberg regarding settlement proposal; email to plaintiff	0.4	195.00	78.00	1,388.18
08/31/2011	August 2011 copies (24 x .10)	1	2.40	2.40	1,390.58
09/07/2011	Prep work on Summary Judgment	1.2	195.00	234.00	1,624.58
09/12/2011	Prepare Motion for Summary Judgment	2.2	195.00	429.00	2,053.58
09/13/2011	Snover Realtime Reporting, transcribe recorded phone conversation	1	102.00	102.00	2,155.58
CURRENT	1-30 DAYS PAST DUE	31-60 DAYS PAST DUE	61-90 DAYS PAST DUE	OVER 90 DAYS PAST DUE	Amount Due
765.00	0.00	0.00	728.88	661.70	\$2,155.58